

EXHIBIT “A”

Tiki Brown
Tiki Brown
Clerk of State Court
Clayton County, Georgia
Latasha Currie

IN THE STATE COURT OF CLAYTON COUNTY

ALEXANDER JOHNSON,

Plaintiff,

v.

F.E. HIOTT TRUCKING, LLC;
MELVIN SANDERS, and
SENTRY SELECT INSURANCE COMPANY,

Defendants.

CIVIL ACTION FILE

NO. 2022CV01813**JURY TRIAL DEMANDED**

COMPLAINT FOR DAMAGES

COMES NOW Plaintiff ALEXANDER JOHNSON, ("Plaintiff"), by and through counsel, and files this Complaint for Damages, showing this Honorable Court as follows:

1.

This is an action for personal injury damages arising out of a motor vehicle collision that occurred on June 11, 2021, in Clayton County, Georgia.

PARTIES, JURISDICTION, AND VENUE

2.

Plaintiff sustained personal injuries as a result of a motor vehicle collision that occurred at approximately 4:27 pm on June 11, 2021, in Clayton County, Georgia.

3.

Plaintiff is a citizen of Clayton County, Georgia.

4.

Defendant Melvin Sanders ("Sanders") resides at 5515 Dais Road, Rembert, Sumter County, South Carolina 29128, and may be served with a copy of the summons and complaint at this address.

5.

Sanders is subject to the jurisdiction of this Court pursuant to O.C.G.A. § 40-12-1, known as Georgia's Non-resident Motorist Act. Sanders is also subject to the jurisdiction of this Court pursuant to O.C.G.A. § 9-10-91, as Sanders committed a tortious act and/or omission within the State of Georgia.

6.

Once served with process, Sanders is subject to the jurisdiction and venue of this Court.

7.

Sanders was properly served with process in this civil action.

8.

Sanders was sufficiently served with process in this civil action.

9.

Sanders is subject to the jurisdiction of this Court.

10.

Defendant F.E. Hiott Trucking, LLC ("Hiott Trucking") is a foreign corporation with its principal place of business in a state other than Georgia and is a federal motor carrier authorized to transport goods for hire in interstate commerce by the Federal Motor Carrier Safety Administration. Hiott Trucking has a U.S. Department of Transportation Number 2154835.

11.

Hiott Trucking is a "non-resident" pursuant to O.C.G.A. § 9-10-91 and a "motor carrier" pursuant to the Federal Motor Carrier Safety Regulations. Hiott Trucking may be served with process by delivering a copy of the Summons and Complaint to its process agent designated to accept service of process in the State of Georgia under the Federal Motor Carrier Safety Regulations: Joseph R. Cullens, P.C., 295 West Crossville Road, Suite 310, Roswell, Georgia 30075.

12.

Hiott Trucking may also be served with process by delivering a copy of the Summons and Complaint under the laws of the State of South Carolina upon its registered agent: Bobbie Prosser, 2736 TV Road, Florence, South Carolina 29501.

13.

Once served with process, Hiott Trucking is subject to the jurisdiction and venue of this Court.

14.

Hiott Trucking was properly served with process in this civil action.

15.

Hiott Trucking was sufficiently served with process in this civil action.

16.

Hiott Trucking is subject to the jurisdiction of this Court.

17.

Defendant Sentry Select Insurance Company ("Sentry Select") is a foreign corporation with its principal place of business in a state other than Georgia and is authorized to transact business in the state of Georgia.

18.

At the time of the Subject Complaint, Hiott Trucking had automobile liability coverage for any damages that were caused through the negligent operation of the commercial motor vehicle that Sanders was operating at the time of the subject collision.

19.

The liability coverage for the collision described in this Complaint is being provided to Hiott Trucking through a policy of insurance issued by Sentry Select and further identified as Policy Number GL1903653, which provides coverage to Hiott Trucking for any damages, including bodily

injury, that were caused through the negligent operation of the commercial motor vehicle that Sanders was operating at the time of the subject collision.

20.

Sentry Select is subject to the jurisdiction of this Court, pursuant to O.C.G.A. §§ 40-1-112 and/or 40-2-140, because Sentry Select was the insurer providing liability coverage for the defendant motor carrier Hiott Trucking at the time of the collision described in this Complaint.

21.

Sentry Select may be served with the Summons and Complaint upon its registered agent: CT Corporation System, 289 S. Culver St., Lawrenceville, Georgia 30046.

22.

Once served with process as described in this paragraph, Sentry Select is subject to the jurisdiction and venue of this Court.

23.

Sentry Select may also be served pursuant to O.C.G.A §§ 14-2-1510 and/or 33-4-3.

24.

Venue in the above-styled civil action is proper in this County and Court.

FACTS

25.

Plaintiff re-alleges and incorporates the preceding paragraphs as if fully set forth herein.

26.

On or about June 11, 2021, at approximately 4:27 pm, Plaintiff was operating a black 2008 Chevrolet Impala heading east on I-285 in Clayton County, Georgia.

27.

On or about June 11, 2021, at approximately 4:27 pm, Sanders was operating a yellow 2017 Freightliner tractor-trailer heading east on I-285 in Clayton County, Georgia, in the lane adjacent to Plaintiff's vehicle.

28.

Sanders was operating the tractor-trailer in the course and scope of this employment with Hiott Trucking, and under Hiott Trucking's U.S. Department of Transportation and federal motor carrier authority.

29.

On or about June 11, 2021, at approximately 4:27 pm, Sanders's vehicle began to merge into Plaintiff's lane of travel.

30.

On or about June 11, 2021, at approximately 4:27 pm, the Hiott Trucking tractor-trailer was being operated by Sanders.

31.

On or about June 11, 2021, at approximately 4:27 pm, Sanders was unable to control the Hiott Trucking tractor-trailer.

32.

On or about June 11, 2021, at approximately 4:27 pm, Sanders failed to maintain his lane of travel.

33.

Suddenly and without warning to Plaintiff, Sanders crossed into Plaintiff's lane of travel.

34.

Sanders slammed the Hiott Trucking tractor-trailer into the driver's side of Plaintiff's vehicle, causing him to suffer injuries.

35.

At all times related to the subject collision, Plaintiff was acting in a reasonable and prudent manner.

36.

Defendants do not blame Plaintiff for causing or contributing to the cause of the subject collision.

37.

Defendants Sanders and Hiott Trucking are 100% at fault for causing the subject collision.

38.

No act or failure to act on the part of the Plaintiff caused or contributed to the cause of the subject collision.

39.

No act or failure to act on the part of any third party caused or contributed to the cause of the subject collision.

40.

No act or failure to act on the part of the Plaintiff caused or contributed to the cause of Plaintiff's claimed injuries.

41.

No act or failure to act on the part of any third party caused or contributed to the cause of Plaintiff's claimed injuries.

42.

Defendants agree that they should fairly compensate Plaintiff for all injuries and damages that were caused by the subject collision.

43.

As a result of the collision, Plaintiff suffered serious and permanent injuries and damages.

COUNT I: DIRECT ACTION AGAINST SENTRY SELECT INSURANCE COMPANY

44.

Plaintiff re-alleges and incorporates the preceding paragraphs as if fully set forth herein.

45.

Sentry Select provided liability insurance for the driver and/or truck that was involved in the subject motor vehicle collision.

46.

Sentry Select agreed to provide insurance coverage to Hiott Trucking in consideration for the payment of insurance premiums.

47.

Sentry Select was transacting business in the State of Georgia and in Clayton County, Georgia on the date of the subject incident, and at all material times hereto, and is subject to the venue of this Court pursuant to O.C.G.A. § 33-4-1.

48.

Plaintiff, as a member of the public injured due to a common carrier's negligence, is a third-party beneficiary to that agreement.

49.

Pursuant to O.C.G.A. §§ 40-1-112 and/or 40-2-140, Sentry Select is subject to this Direct Action.

COUNT II: NEGLIGENCE OF F.E. HIOTT TRUCKING, LLC

50.

Plaintiff re-alleges and incorporates the preceding paragraphs as if fully set forth herein.

51.

At all times material hereto, Sanders was an employee of Hiott Trucking.

52.

At all times material hereto, Sanders was acting within the scope and course of his employment with Hiott Trucking.

53.

At all times material hereto, Sanders was driving under dispatch by Hiott Trucking and driving under Hiott Trucking's authority as a federal motor carrier.

54.

At all times material hereto, Sanders was authorized by Hiott Trucking to operate the tractor-trailer that was involved in the collision described in this Complaint.

55.

Hiott Trucking is liable for the negligent actions and omissions of Sanders pursuant to the doctrine of *respondeat superior*.

56.

Hiott Trucking was the owner of the vehicle operated by Sanders and is therefore liable for damages caused in this case.

57.

Hiott Trucking was also itself negligent in the following ways:

- a. Negligently hiring or contracting with Defendant Melvin Sanders to drive the vehicle at issue;
- b. Negligently training Defendant Melvin Sanders;
- c. Negligently entrusting Defendant Melvin Sanders to drive the vehicle professionally;
- d. Negligently retaining Defendant Melvin Sanders to drive the vehicle at issue;
- e. Negligently qualifying Defendant Melvin Sanders;
- f. Failing to supervise Defendant Melvin Sanders; and
- g. Otherwise failing to act as a reasonably prudent company under the circumstances.

60.

As a direct and proximate result of the negligence of Defendants Melvin Sanders and F.E. Hiott Trucking, LLC in the ensuing collision, Plaintiff sustained severe and permanent injuries.

61.

Hiott Trucking is liable for all damages allowed by law for the injuries, damages, and losses sustained by Plaintiff.

COUNT III: NEGLIGENCE OF DEFENDANT MELVIN SANDERS

62.

Plaintiff re-alleges and incorporates the preceding paragraphs as if fully set forth herein.

63.

At all relevant times, Sanders owed the following civil duties to Plaintiff but violated those duties in the following ways:

- a. Failing to activate his turn signal;
- b. Failing to maintain his lane of travel;
- c. Failing to maintain proper control of his vehicle;
- d. Failing to keep a proper lookout for traffic;
- e. Failing to make reasonable and proper observations while driving;
- f. Failing to timely apply the brakes of his vehicle in order to avoid the collision in question;
- g. Failing to keep an assured safe distance from Plaintiff's vehicle;
- h. Failing to drive at a reasonable and prudent speed under the conditions;
- i. Failing to obey traffic laws;
- j. Operating a cellular mobile device while driving; and
- k. Otherwise failing to act reasonably and prudently as a driver should under the circumstances.

64.

Defendant was also negligent *per se* in that he violated a number of laws and regulations governing his operation of a vehicle, including:

- a. Turning Movements; Signals Required on Turning, Changing Lanes, Slowing, or Stopping (O.C.G.A. §40-6-123);
- b. Driving on Roadways Laned for Traffic (O.C.G.A. § 40-6-48);
- c. Failing to Drive with Due Care (O.C.G.A. § 40-6-241);
- d. Failure to Drive Vehicle at a Reasonable and Prudent Speed Under the Conditions (O.C.G.A. § 40-6-180);
- e. Failing to Obey Traffic Laws (O.C.G.A. § 40-6-1); and
- f. Reckless Driving (O.C.G.A. § 40-6-390).

65.

As a result of Sanders's negligence, Plaintiff suffered severe and permanent injuries.

66.

As a direct and proximate result of the negligence and negligence per se of Sanders, Plaintiff has incurred and is entitled to recover special damages, including, but not limited to, past medical expenses in the amount of \$21,681.33, and future medical expenses and past and future lost income and loss of earning capacity, and other miscellaneous expenses, in an amount that will be proved at trial. Plaintiff is also entitled to recover for her general damages, including past and future pain and suffering and related damages.

COUNT IV: COMBINED AND CONCURRING NEGLIGENCE

67.

Plaintiff re-alleges and incorporates the preceding paragraphs as if fully set forth herein.

68.

Hiott Trucking and Sanders acted in a manner which either alone, and/or combined and concurring with the actions of the acts of negligence described herein, directly and proximately caused the collision and Plaintiff's injuries.

69.

As a direct and proximate result of the negligence of the Hiott Trucking and Sanders, Plaintiff was physically injured, has suffered, and will continue to suffer pain, disability, loss of earning capacity, loss of enjoyment of life, anxiety, and related damages.

70.

As a direct and proximate result of the breaches of duty by Hiott Trucking and Sanders, Plaintiff is entitled to recover fair and full compensation for all injuries and damages that have been suffered as a proximate result of the collision and that will be suffered in the future as a result of the collision, including, without limitation, all special damages and compensatory damages, medical expenses, lost wages, and other necessary expenses, as well as fair and full compensation for all pain and suffering, including physical pain, mental and emotional suffering, shock of impact, disability, worry, anxiety, loss of enjoyment of life, loss of capacity to work, and other categories of damages provided for under the law.

COUNT V: PUNITIVE DAMAGES

71.

Plaintiff re-alleges and incorporates the preceding paragraphs as if fully set forth herein.

72.

The acts of Hiott Trucking and Sanders were willful, wanton, and/or demonstrated that entire want of care, which raises the presumption of a conscious indifference to consequences.

73.

Accordingly, Defendants are liable to the Plaintiff for punitive damages to punish, penalize, and deter Defendants from similar conduct in the future.

WHEREFORE, Plaintiff prays that the following relief be granted:

- a. A trial by jury;
- b. For Summons and Complaint to issue against each Defendant;

- c. For judgment against each Defendant to compensate Plaintiff for past and future injuries and damages;
- d. For judgment against each Defendant for punitive damages as shown to be fair and appropriate at the trial of this case;
- e. Court costs, discretionary costs, and prejudgment interest; and
- f. For all such further and general relief which this Court deems just and proper.

Dated: August 15, 2022.

WLG ATLANTA, LLC

/s/ Johnquel Neal

JOHNQUEL NEAL

GEORGIA STATE BAR NUMBER 214455

ATTORNEY FOR PLAINTIFF

BANK OF AMERICA PLAZA
600 PEACHTREE STREET, NE, SUITE 4010
ATLANTA, GA 30308
TELEPHONE: (470) 881-8804
FACSIMILE: (470) 408-5662
E-MAIL: JOHNQUEL.NEAL@WITHERITELAW.COM

General Civil and Domestic Relations Case Filing Information Form

Tiki Brown
Tiki Brown
Clerk of State Court
Clayton County, Georgia
Latasha Currie

☐ Superior or ☒ State Court of CLAYTON County

For Clerk Use Only

Date Filed 8/15/2022Case Number 2022CV01813

MM-DD-YYYY

Plaintiff(s)

JOHNSON, ALEXANDER

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Plaintiff's Attorney Johnquel Neal

Defendant(s)

F.E. HIOTT TRUCKING, LLC

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Bar Number 214455Self-Represented ☐

Check One Case Type in One Box

General Civil Cases

- ☒ Automobile Tort
☐ Civil Appeal
☐ Contract
☐ Garnishment
☐ General Tort
☐ Habeas Corpus
☐ Injunction/Mandamus/Other Writ
☐ Landlord/Tenant
☐ Medical Malpractice Tort
☐ Product Liability Tort
☐ Real Property
☐ Restraining Petition
☐ Other General Civil

Domestic Relations Cases

- ☐ Adoption
☐ Dissolution/Divorce/Separate Maintenance
☐ Family Violence Petition
☐ Paternity/Legitimation
☐ Support – IV-D
☐ Support – Private (non-IV-D)
☐ Other Domestic Relations

Post-Judgment – Check One Case Type

- ☐ Contempt
☐ Non-payment of child support, medical support, or alimony
☐ Modification
☐ Other/Administrative

- ☐ Check if the action is related to another action(s) pending or previously pending in this court involving some or all of the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number

Case Number

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.

- ☐ Is an interpreter needed in this case? If so, provide the language(s) required. Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

Tiki Brown
Tiki Brown
Clerk of State Court
Clayton County, Georgia
Latasha Currie

IN THE STATE COURT OF CLAYTON COUNTY, GEORGIA

9151 TARA BOULEVARD, ROOM 1CL181, JONESBORO, GEORGIA 30236

TELEPHONE: (770) 477-3388 * FACSIMILE: (770) 472-8159

ALEXANDER JOHNSON

Plaintiff

2022CV01813

Vs.

Case Number

F.E. HIOTT TRUCKING, LLC

c/o Registered Agent: Joseph R. Cullens, PC

295 W. Crossville Rd., Suite 310, Roswell, GA 30075

Defendant

SUMMONS

TO THE ABOVE NAMED DEFENDANT(S):

You are hereby summoned and required to file with the Clerk of said Court and serve upon Plaintiff's Attorney, whose name and address is:

Johnquel Neal
WLG Atlanta, LLC
600 Peachtree St. NE, Suite 4010
Atlanta, GA 30303

answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, Judgment by default will be taken against you for the relief demanded in the complaint.

TIKI BROWN
CLERK OF COURT
State Court of Clayton County

/s/ Latasha Currie

By: _____
Deputy Clerk

Tiki Brown
Tiki Brown
Clerk of State Court
Clayton County, Georgia
Latasha Currie

IN THE STATE COURT OF CLAYTON COUNTY, GEORGIA

9151 TARA BOULEVARD, ROOM 1CL181, JONESBORO, GEORGIA 30236

TELEPHONE: (770) 477-3388 * FACSIMILE: (770) 472-8159

ALEXANDER JOHNSON

Plaintiff

Vs.

2022CV01813

Case Number

SENTRY SELECT INSURANCE COMPANY

c/o Registered Agent: CT Corporation System

289 S. Culver St., Lawrenceville, GA 30046

Defendant

SUMMONS

TO THE ABOVE NAMED DEFENDANT(S):

You are hereby summoned and required to file with the Clerk of said Court and serve upon Plaintiff's Attorney, whose name and address is:

Johnquel Neal
WLG Atlanta, LLC
600 Peachtree St. NE, Suite 4010
Atlanta, GA 30303

answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, Judgment by default will be taken against you for the relief demanded in the complaint.

TIKI BROWN
CLERK OF COURT
State Court of Clayton County

By: /s/ Latasha Currie
Deputy Clerk

Tiki Brown
 Tiki Brown
 Clerk of State Court
 Clayton County, Georgia
 Latasha Currie

IN THE STATE COURT OF CLAYTON COUNTY, GEORGIA

9151 TARA BOULEVARD, ROOM 1CL181, JONESBORO, GEORGIA 30236

TELEPHONE: (770) 477-3388 * FACSIMILE: (770) 472-8159

ALEXANDER JOHNSON

Plaintiff

2022CV01813

Vs.

Case Number

MELVIN SANDERS

5515 Dais Road

Rembert, SC 29128

Defendant

SUMMONS

TO THE ABOVE NAMED DEFENDANT(S):

You are hereby summoned and required to file with the Clerk of said Court and serve upon Plaintiff's Attorney, whose name and address is:

Johnquel Neal
 WLG Atlanta, LLC
 600 Peachtree St. NE, Suite 4010
 Atlanta, GA 30303

answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, Judgment by default will be taken against you for the relief demanded in the complaint.

TIKI BROWN
CLERK OF COURT
 State Court of Clayton County

/s/ Latasha Currie

By: _____
 Deputy Clerk

AFFIDAVIT OF SERVICE

Tiki Brown
Tiki Brown
 Clerk of State Court
 Clayton County, Georgia
 Hannah Lowery

Case: 2022CV01813	Court: State Court of Clayton County	County: Clayton	Job: 7523977
Plaintiff / Petitioner: Alexander Johnson		Defendant / Respondent: F.E Hiott Trucking LLC, Melvin Sanders and Sentry Select Insurance Company	
Received by: CGA Solutions		For: Witherite Law Group, LLC	
To be served upon: Melvin Sanders			

I, J Alexander Chilton, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

Recipient Name / Address: Melvin Sanders , 5515 Dais Road , Rembert, SC 29128

Manner of Service: Personal/Individual, Aug 20, 2022, 10:19 am EDT

Documents: Summons, Complaint for Damages, Plaintiff's First Interrogatories, First Requests for Production of Documents, and First Requests for Admission to Defendant Melvin Sanders, Plaintiff's First Interrogatories, First Requests for Production of Documents, and First Requests for Admission to Defendant F.E Hiott Trucking, LLC. (Received Aug 16, 2022 at 3:09pm EDT)

Additional Comments:

1) Successful Attempt: Aug 20, 2022, 10:19 am EDT at 5515 Dais Road , Rembert, SC 29128 received by Melvin Sanders . Age: 45-55; Ethnicity: African American; Gender: Male; Weight: 180; Height: 6'0"; Hair: Other; Eyes: Brown; Relationship: Self; Defendant positively identified self at time of service. However he refused to accept the service package into his hand. The defendant stated his lawyer told him he was not any documents associated with this matter. I laid the documents at the defendant's feet. The defendant told me to have a blessed day and closed the door.

J Alexander Chilton
 J Alexander Chilton

8/22/22
 Date

CGA Solutions
 723 Main Street
 Stone Mountain, GA 30083
 706-589-8788

Subscribed and sworn to before me by the affiant who is personally known to me.

[Signature]
 Notary Public

8-22-2022
 Date

11-8-2022
 Commission Expires



AFFIDAVIT OF SERVICE

Tiki Brown
 Tiki Brown
 Clerk of State Court
 Clayton County, Georgia
 Shalonda Green

Case: 2022CV01813	Court: State Court of Clayton County	County: Clayton	Job: 7523977
Plaintiff / Petitioner: Alexander Johnson		Defendant / Respondent: F.E Hiott Trucking LLC, Melvin Sanders and Sentry Select Insurance Company	
Received by: CGA Solutions		For: Witherite Law Group, LLC	
To be served upon: Sentry Select Insurance Company c/o CT Corporation System, Registered Agent			

I, Thomas David Gibbs III, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

Recipient Name / Address: Jane Richardson, CT Corporation System : 289 S. Culver St, Lawrenceville, GA 30046

Manner of Service: Registered Agent, Aug 18, 2022, 9:39 am EDT

Documents: Summons, Complaint for Damages (Received Aug 16, 2022 at 3:09pm EDT)

Additional Comments:

1) Successful Attempt: Aug 18, 2022, 9:39 am EDT at CT Corporation System : 289 S. Culver St, Lawrenceville, GA 30046 received by Jane Richardson.

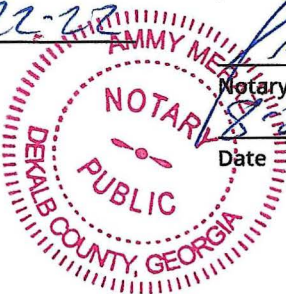
Agent designated by CT Corporation to accept service

Subscribed and sworn to before me by the affiant who is personally known to me.

Thomas David Gibbs III
 Thomas David Gibbs III

8-22-22
 Date

CGA Solutions
 723 Main Street
 Stone Mountain, GA 30083
 706-589-8788



[Signature]
 Notary Public

8-22-22
 Date

12-27-24
 Commission Expires

IN THE STATE COURT OF CLAYTON COUNTY
STATE OF GEORGIA

RECEIVED & FILED

JAN 05 2022

ORDER FOR APPOINTMENT FOR PROCESS SERVICE

CLERK STATE COURT
CLAYTON COUNTY

Having read and considered the petitions and criminal records, and it appearing to the Court that sufficient grounds exist that each petitioner meets the requirements for appointment by the Court it is hereby

ORDERED and **ADJUDGED** that the following:

Abraham, Robyn	Cunningham, Sally	Hassan, Muhsin	Morgan, Todd	Saxon-Ford, Virginia
Adonni Huguley, CK	Dambach-Cirko, P.	Hassan, Muhsin S.	Mott, Cynthia	Seklecki, Christian
Anderson, Qaisar	Davidson, Danny	Highsmith, Amos	Murphy, Jr. Gregory	Singleton, Wesley
Andrews, II. Gene	Davidson, Mitchell	Hill, Hollis	Murrah, JuanQualo	Smith, Ronald
Armstrong, C.	Day, Duane	Hines, Jr. James	Nichols, Jean	Snellings, Sharon
Bailey, Anna	Earthrise, Rochelle	Horton, Christopher	Nichols, Lathan	Spears, Joye
Barnes, Kristopher	Echols, Eric	Horton, Malachi	Nolen, Milton	Starks, Marc
Barron, Shane	Echols, Patricia	Hudson, Kyle	Palmer, Alita	Stephens, Geri
Basham, James	Farkas, Bela	Jackson, II. Anthony	Parker, Ernesqueshia	Stinyard, Kelvin
Benito, Richard	Fazzio, Dedrea	James, Frank	Perlson, Marc	Stone, Alesia
Brazeman, Craig	Fisher, Dawn	Jenkins, Stephanie	Phelan, Christine	Swindle, Frank
Bridges, Kayla	Folds, Catherina	Johnson, Todd	Phelan, Ross	Swinger, Ina
Briley, Donnie	Folds, George	Kahssu, Haile	Rhodes, Kathryn	Tassaw, Berhane
Bryant, Shemika	Ford, Ronnie	Kotlar, Michael	Richardson, Clark	Thomas, Jeffrey
Bunch, Kim	Fuller, Thomas	Lawson, Zuri	Richardson, Leroy	Thompson, Vanessa
Butts, Kimberly	Garmon, Jason	Lewis, Kevin	Robbins, Karen	Thrash, Nancy
Byer, Edmond	Gayle, Earl	Lutwack, William	Ruddock, Leopold	Turner, Travis
Cabrera-Anderson, S.	Gibbs, III. Thomas	Mallas, Nicholas	Ruddock, Margaret	Walker Whisby, K.
Childress, Clifton	Giles, Herbert	McClellan, Rodney	Sadler, Jr. John	Weaver, Sebastian
Clemmons, Joyce	Greenway, Kimberly	McGahee, Larry	Saxon, Jasmine	Weeks, Frances
Cline, Travis	Grimshaw, Shane	McMillon, Ericka	Saxon, Rashad	West, Eric
Cochrane, Babette	Harris, Parks	Mitchell, Kevin	Saxon, Robin	Winkelman, Nan

be appointed and authorized to serve as a Permanent Process Server in the Clayton County State Court for calendar year 2022, without the necessity of an order for appoint in each individual case.

SO ORDERED this 3 day of January 2022.


Chief Judge Linda S. Cowen

AFFIDAVIT OF SERVICE

Tiki Brown
 Tiki Brown
 Clerk of State Court
 Clayton County, Georgia
 Shalonda Green

Case: 2022CV01813	Court: State Court of Clayton County	County: Clayton	Job: 7523977
Plaintiff / Petitioner: Alexander Johnson		Defendant / Respondent: F.E Hiott Trucking LLC, Melvin Sanders and Sentry Select Insurance Company	
Received by: CGA Solutions		For: Witherite Law Group, LLC	
To be served upon: F.E Hiott Trucking LLC c/o Joseph R. Cullens, Registered Agent			

I, Thomas David Gibbs III, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

Recipient Name / Address: Joseph R. Cullens, Registered Agent , 295 W. Crossville Rd Suite 310, Roswell, GA 30075

Manner of Service: Registered Agent, Aug 19, 2022, 2:18 pm EDT

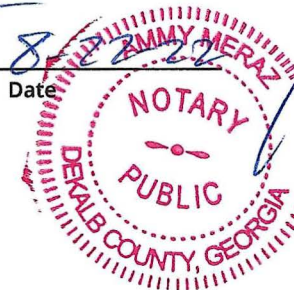
Documents: Summons, Complaint for Damages, Plaintiff's First Interrogatories, First Requests for Production of Documents, and First Requests for Admission to Defendant F.E Hiott Trucking, LLC. (Received Aug 16, 2022 at 3:09pm EDT)

Additional Comments:

1) Successful Attempt: Aug 19, 2022, 2:18 pm EDT at 295 W. Crossville Rd Suite 310, Roswell, GA 30075 received by Joseph R. Cullens, Registered Agent . Age: 70-75; Ethnicity: Caucasian; Gender: Male; Weight: 180; Height: 5'9"; Hair: White; positively identified self at time of service.

Thomas David Gibbs III
 Thomas David Gibbs III

CGA Solutions
 723 Main Street
 Stone Mountain, GA 30083
 706-589-8788



Subscribed and sworn to before me by the affiant who is personally known to me.

[Signature]
 Notary Public

Date

Commission Expires

12-27-29

IN THE STATE COURT OF CLAYTON COUNTY
STATE OF GEORGIA

RECEIVED & FILED
JAN 05 2022

ORDER FOR APPOINTMENT FOR PROCESS SERVICE

CLAYTON COUNTY
CLAYTON COUNTY

Having read and considered the petitions and criminal records, and it appearing to the Court that sufficient grounds exist that each petitioner meets the requirements for appointment by the Court it is hereby

ORDERED and **ADJUDGED** that the following:

Abraham, Robyn	Cunningham, Sally	Hassan, Muhsin	Morgan, Todd	Saxon-Ford, Virginia
Adonni Huguley, CK	Dambach-Cirko, P.	Hassan, Muhsin S.	Mott, Cynthia	Seklecki, Christian
Anderson, Qaisar	Davidson, Danny	Highsmith, Amos	Murphy, Jr. Gregory	Singleton, Wesley
Andrews, II. Gene	Davidson, Mitchell	Hill, Hollis	Murrah, JuanQualo	Smith, Ronald
Armstrong, C.	Day, Duane	Hines, Jr. James	Nichols, Jean	Snellings, Sharon
Bailey, Anna	Earthrise, Rochelle	Horton, Christopher	Nichols, Lathan	Spears, Joye
Barnes, Kristopher	Echols, Eric	Horton, Malachi	Nolen, Milton	Starks, Marc
Barron, Shane	Echols, Patricia	Hudson, Kyle	Palmer, Alita	Stephens, Geri
Basham, James	Farkas, Bela	Jackson, II. Anthony	Parker, Ernesqueshia	Stinyard, Kelvin
Benito, Richard	Fazzio, Dedrea	James, Frank	Perlson, Marc	Stone, Alesia
Brazeman, Craig	Fisher, Dawn	Jenkins, Stephanie	Phelan, Christine	Swindle, Frank
Bridges, Kayla	Folds, Catherina	Johnson, Todd	Phelan, Ross	Swinger, Ina
Briley, Donnie	Folds, George	Kahssu, Haile	Rhodes, Kathryn	Tassaw, Berhane
Bryant, Shemika	Ford, Ronnie	Kotlar, Michael	Richardson, Clark	Thomas, Jeffrey
Bunch, Kim	Fuller, Thomas	Lawson, Zuri	Richardson, Leroy	Thompson, Vanessa
Butts, Kimberly	Garmon, Jason	Lewis, Kevin	Robbins, Karen	Thrash, Nancy
Byer, Edmond	Gayle, Earl	Lutwack, William	Ruddock, Leopold	Turner, Travis
Cabrera-Anderson, S.	Gibbs, III. Thomas	Mallas, Nicholas	Ruddock, Margaret	Walker Whisby, K.
Childress, Clifton	Giles, Herbert	McClellan, Rodney	Sadler, Jr. John	Weaver, Sebastian
Clemmons, Joyce	Greenway, Kimberly	McGahee, Larry	Saxon, Jasmine	Weeks, Frances
Cline, Travis	Grimshaw, Shane	McMillon, Ericka	Saxon, Rashad	West, Eric
Cochrane, Babette	Harris, Parks	Mitchell, Kevin	Saxon, Robin	Winkelman, Nan

be appointed and authorized to serve as a Permanent Process Server in the Clayton County State Court for calendar year 2022, without the necessity of an order for appoint in each individual case.

SO ORDERED this 3 day of January, 2022.


Chief Judge Linda S. Cowen